

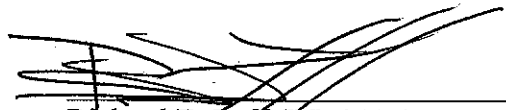
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X	21 MC 102 (AKH)
IN RE: WORLD TRADE CENTER LOWER	
MANHATTAN DISASTER SITE LITIGATION	21 MC 103 (AKH)
IN RE: COMBINED WORLD TRADE CENTER	NOTICE OF MOTION
LOWER MANHATTAN DISASTER SITE	
LITIGATION (straddler plaintiffs)	
-----X	

PLEASE TAKE NOTICE THAT upon the Declaration of Richard E. Leff dated May 20, 2013 and exhibits annexed thereto will hereby move this Court to dismiss with prejudice certain Plaintiffs' claims for violations of established discovery rules and procedures pursuant to Rule 37 of the Federal Rules of Civil Procedure.

Dated: New York, New York
May 20, 2013

Respectfully submitted,


Richard E. Leff (RL-2123)
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